

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
ENTERTAINMENT MEDIA TRUST,)	MB Docket No. 19-156
DENNIS J. WATKINS, TRUSTEE)	
)	
Applications to Renew License:)	
)	
KFTK(AM) (formerly WQQX(AM)), East St.)	Facility ID No. 72815
Louis, Illinois)	File No: BR-20120709ACP
)	
WQQW(AM), Highland, Illinois)	Facility ID No. 90598
)	File No. BR-20120709AC0
)	
KZQZ(AM), St. Louis, Missouri)	Facility ID No. 72391
)	File No. BR-20120921AAW
)	
KQQZ(AM), DeSoto, Missouri)	Facility ID No. 5281
)	File No. BR-20120921ABA
)	
Application for Consent to Assignment of)	
Licenses:)	
)	
KFTK(AM) (formerly WQQX(AM)), East St.)	Facility ID No. 72815
Louis, Illinois)	File No: BAL-20160919ADH
)	
WQQW(AM), Highland, Illinois)	Facility ID No. 90598
)	File No. BAL-20160919ADI
)	
KZQZ(AM), St. Louis, Missouri)	Facility ID No. 72391
)	File No. BAL-20160919ADJ
)	
KQQZ(AM), DeSoto, Missouri)	Facility ID No. 5281
)	File No. BAL-0160919ADK
)	
Application for Permit to Construct New Station:)	
)	
W275CS, Highland, Illinois)	Facility ID No. 200438
)	File Nos. BNPFT-
)	20170726AEF and BNPFT-
)	20180314AAO
)	

MOTION FOR EXTENSION OF TIME

Applicant, Entertainment Media Trust, Dennis J. Watkins, Trustee (“EMT”), by

and through counsel, hereby requests, pursuant to 47 CFR §1.205, an extension of time to respond to the Enforcement Bureau's First Set of Interrogatories (the "First Interrogatories") served upon EMT on August 20, 2019. In support of this request, the following is stated:

1. Pursuant to 47 CFR §1.323, the response date to the First Interrogatories is September 3, 2019.
2. EMT requires a minimum of two additional weeks to respond to the Bureau's First Interrogatories.
3. This request is not made for the purpose of delay but is made in light of the following circumstances:
 - a. Since August 15, 2019, EMT has been engaged with the Bureau in discussions regarding potential avenues to more quickly resolve this matter. As those discussions are ongoing, with the latest having occurred on August 28, 2019, EMT respectfully submits that the additional time requested is warranted to allow pursuit of options that may serve the public interest and minimize the burdens on the Commission and the parties of a full hearing process.
 - b. EMT has scheduled a meeting for Tuesday, September 3, 2019, with potential counsel regarding a possible bankruptcy filing. Additional time is therefore warranted in light of the fact that a bankruptcy filing by EMT would result in a stay of this proceeding.
 - c. Paul Lauber, preparer of the 2012 Restated Trust Instrument and the EMT #2 documents, was out of the country until Monday, September 2, 2019, and EMT was therefore unable to fully respond to interrogatories

relating to Mr. Lauber.

- d. Lastly, the Bureau put forth more than 90 interrogatories. Even with the most diligent of efforts, fourteen days simply is insufficient to provide thorough answers to ninety-two interrogatories, many of them necessitating communications with multiple parties and soliciting thoughtful explanations rather than simple responses. EMT notes that the Federal Rules of Civil Procedure, Fed. R. Civ. Proc. 33, grant litigants thirty (30) days to respond to interrogatories, while limiting parties to propounding not more than twenty-five (25) interrogatories at a time. The Bureau has served EMT with nearly four times the number of interrogatories permitted in federal litigation and expects responses in less than half the time. EMT respectfully suggests that the number of interrogatories expected to be answered in such a short timeframe is an abuse of process, designed to cause EMT to produce incomplete responses.

EMT submits that the relief requested is reasonable and does not prejudice any party. EMT appreciates the Presiding Judge's directive to conduct this proceeding expeditiously. Efforts to streamline this matter by way of EMT's discussions with the Enforcement Bureau certainly satisfy this directive. A relatively brief extension of time to allow continuation of those discussions while EMT simultaneously evaluates bankruptcy necessitated by the legal fees incurred in this proceeding thus far is not out of order. Moreover, the sheer volume of interrogatories demands additional time in order to allow complete and thorough responses.

Accordingly, EMT hereby requests that the deadline for its response to the First Interrogatories be extended until and including September 17, 2019.

RESPECTFULLY SUBMITTED,

_____/s/_____
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CERTIFICATE OF SERVICE

I, Seth Williams, hereby certify that on this 3rd day of September, 2019, a copy of the foregoing Motion for Extension of Time was served by email on the following:

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Courtesy copies of the foregoing were also provided by email to the following:

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/s/ Seth L. Williams
